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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VANGUARD DEALER SERVICES, LLC and
MOTOR DEALER SERVICES GROUP, LLC,

Plaintiff,

v.

JORGE CERVANTES and CEC INDUSTRIES
INC. d/b/a DEALERS DIRECT SYSTEMS
and/or DEALERS DIRECT CONSULTANTS,

Defendants.

Case No. 2:21-cv-01121-JAD-EJY

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE REPLY
IN SUPPORT OF MOTION TO DISMISS
COUNTERCLAIM AND MOTION TO
STRIKE AFFIRMATIVE DEFENSES**

(FIRST REQUEST)

ECF No. 71

JORGE CERVANTES, CEC INDUSTRIES
INC. d/b/a DEALERS DIRECT SYSTEMS
and/or DEALERS DIRECT CONSULTANTS,

Counterclaimants,

v.

VANGUARD DEALER SERVICES, LLC and
MOTOR DEALER SERVICES GROUP, LLC,

Counterdefendants.

Plaintiffs/counterdefendants Vanguard Dealer Services, LLC and Motor Dealer Services
Group, LLC, and defendants/counterclaimants Jorge Cervantes and CEC Industries, Inc., hereby
stipulate and agree to the following:

...

{67247629;1}

1. On August, 29, 2022, defendants filed an answer to plaintiffs' second amended complaint and counterclaim. ECF No. 59. On October 6, 2022, plaintiffs filed a motion to dismiss the counterclaim and a motion to strike affirmative defenses (the **motion**). ECF Nos. 62 & 63. On November 3, 2022, defendants filed their opposition to plaintiffs' motion. ECF Nos. 69 & 70.

2. The current deadline for plaintiffs to file their reply is November 10, 2022.

3. Counsel for plaintiffs are in the process of conferring with their clients regarding their reply in support of the motion. As such, the parties hereby stipulate and agree that the deadline for plaintiffs' reply shall be extended by thirteen (13) days, up to and including November 23, 2022.

4. The parties agree this stipulation is not meant for delay and will not prejudice any party.

DATED this 9th day of November, 2022.

AKERMAN LLP	SEMENZA KIRCHER RICKARD
<p><u>/s/ Scott R. Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134</p> <p><i>Attorneys for Vanguard Dealer Services, LLC and Motor Dealer Services Group, LLC</i></p>	<p><u>/s/ Katie L. Cannata</u> LAWRENCE J. SEMENZA, ESQ. Nevada Bar No. 7174 CHRISTOPHER D. KIRCHER, ESQ. Nevada Bar No. 11176 JARROD L. RICKARD, ESQ. Nevada Bar No. 10203 KATIE L. CANNATA, ESQ. Nevada Bar No. 14848 10161 Park Run Drive, Suite 150 Las Vegas, NV 89145 Attorneys for Jorge Cervantes and CEC Industries, Inc.</p>

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: 11/14/2022, nunc pro tunc to
11/10/22

AKERMAN LLP

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